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To: [Strategy](#)
Cc: [Parish, Sally](#); [McCaffrey, Lisa](#)
Subject: Highways England
Date: 03 March 2020 08:25:25
Importance: High

Dear Strategy Team,

Please find attached a copy of Highways England's comments on the above.

Regards,

Chrystèle Garnier-Kusiak

Administrator - Performance Assurance & Business Services Team

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Somerset West and Taunton

Via email: strategy@somersetandwesttaunton.gov.uk

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03 March 2020

Dear Strategy Team,

SOMERSET WEST AND TAUNTON LOCAL PLAN 2040: ISSUES AND OPTIONS CONSULTATION, JANUARY 2020

Highways England welcomes the opportunity to comment on the South West and Taunton Local Plan 2040 Issues and Options consultation. As you'll be aware we are responsible for operating, maintaining and improving the Strategic Road Network (SRN), which in the Plan area comprises the M5 including Junctions 25 and 26.

On 1 April 2019 the former Councils of West Somerset and Taunton Deane Borough combined to form the Somerset West and Taunton Council (SWT). The newly formed SWT are now developing a Local Plan to set out the spatial strategy for development across the new Plan area up to 2040.

It is on the basis of these responsibilities that the comments that follow in this letter have been made.

We are interested in the potential traffic impacts of any development site proposals and/or policies coming forward through the Local Plan process and need to ensure that these are fully assessed during the plan-making stage. It is imperative to identify any improvements needed to deliver aspirations at this early stage, as set out in Government policy.

Paragraph 12 of Circular 02/2013 states that *'The preparation and delivery of Local Plans provides an opportunity to identify and support a pattern of development that minimises trip generation at source and encourages the use of sustainable modes of transport, minimises journey lengths for employment, shopping, leisure, education and other activities, and promotes accessibility for all. This can contribute to environmental objectives and also reduce the cost to the economy arising from the environmental, business and social impacts associated with traffic generation and congestion.'*

Paragraph 15 states that *'In order to develop a robust transport evidence base [for local plans], the Agency (now Highways England) will work with the local authority to understand the transport implications of development options. This will include assessing the cumulative and individual impacts of the Local Plan proposals upon the ability of the road links and junctions affected to accommodate the forecast traffic flows in terms of capacity and safety.'*

Paragraph 18 states that *'Capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider*

development aspirations alongside the associated strategic infrastructure needs. Enhancements should not normally be considered as fresh proposals at the planning application stage. The Highways Agency (now Highways England) will work with strategic delivery bodies to identify infrastructure and access needs at the earliest possible opportunity in order to assess suitability, viability and deliverability of such proposals, including the identification of potential funding arrangements.'

Responses to Local Plan consultations are also guided by other pertinent policy and guidance, namely the NPPF and the 'Highways Agency and the Local Plan Process' protocol – now applicable to Highways England.

The National Planning Policy Framework (NPPF) sets out that plans should be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and statutory consultees. (para 16).

Transport issues should be considered from the earliest stages of plan-making and development proposals so that the potential impact of development on transport networks can be addressed. (para 102).

The planning system should actively manage patterns of growth such that significant development is focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. (para 103).

Planning policies should be prepared with the active involvement of highways authorities and other transport infrastructure providers so that strategies and investments for supporting sustainable transport and development patterns are aligned. (para 104).

Planning policies and decisions should support development that makes efficient use of land, taking into account the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use. (para 122).

In terms of identifying the necessity of transport infrastructure, NPPF confirms that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. (para 109).

Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (including transport). Such policies should not undermine the deliverability of the plan. (para 34).

In summary; in order for the transport evidence base to satisfy the requirements of NPPF and Circular 02/2013, it is necessary to establish:

- The transport impacts of the development allocations.
- The improvements necessary to ensure that the impacts are not severe.
- Any land required for the delivery of the necessary improvements.
- The cost of the necessary improvements.
- Any other deliverability constraints.

Paragraphs 9 and 10 set out the approach that Highways England takes in relation to development proposals as follows:

“9. Development proposals are likely to be acceptable if they can be accommodated within the existing capacity of a section (link or junction) of the strategic road network, or they do not increase demand for use of a section that is already operating at over-capacity levels, taking account of any travel plan, traffic management and/or capacity enhancement measures that may be agreed. However, development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

10. However, even where proposals would not result in capacity issues, the Highways England’s prime consideration will be the continued safe operation of its network”.

Applying the principals of paragraph 9 of Circular 02/2013, development proposals are likely to be unacceptable, by virtue of a severe impact, if they increase demand for use of a section that is already operating at over-capacity levels, or cannot be safely accommodated, i.e, a development which adds traffic to a junction which already experiences road safety issues; would increase the frequency of occurrence of road safety issues; or would in itself cause those road safety issues to arise, would be considered to have a severe impact. In order to establish whether a section of the SRN has a severe impact, an assessment of additional traffic on the SRN as a result of the development proposals will be necessary, and agreement should be sought on the best way to establish whether the additional traffic constitutes a severe impact.

Strategic Road Network Considerations

Highways England draws attention to the current performance of the SRN, within and just outside the Plan’s boundaries, which will need to be considered in the evidence base supporting the new Local Plan. Junction 25 of the M5 is already constrained at peak times, resulting in queuing and delay. It is noted that Somerset County Council are currently delivering an improvement scheme at Junction 25 to accommodate growth previously allocated in the Taunton Deane Core Strategy 2011-2028 (adopted September 2012). The impact of development beyond existing committed development within the Plan area will need to be considered as part of the Local Plan transport evidence base.

Whilst we are not currently aware of any significant constraints on the operation of Junction 26, the impact of the growth proposed within the new Local Plan on the safe operation of Junction 26 will need to be considered through the development of a robust transport evidence base.

Highways England announced the preferred route for the proposed A358 corridor scheme on 2 September 2019, which will involve the upgrading of the route between M5 J25 at Taunton and the A303 at the Southfields roundabout, to dual carriageway with the provision of associated new junctions. The scheme will now be developed in more detail and the proposals will be subject to further Statutory consultation. The scheme is classed as a Nationally Significant Infrastructure Project (NSIP) which will require Highways England to apply for a Development Consent Order (DCO) and undertake appropriate consultation with local authorities, technical stakeholders and representatives of the local community.

In accordance with Paragraphs 9 and 10 of the DfT Circular 02/2013, *‘(9) development proposals are likely to be acceptable if they can be accommodated within the existing capacity of a section (link or junction) of the SRN, or they do not increase demand for use of a section that is already operating at*

over-capacity levels, taking account of any travel plan, traffic management and/or capacity enhancement measures that may be agreed. However, development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. (10) However, even where proposals would not result in capacity issues, the Highways Agency's (Highways England's) prime consideration will be the continued safe operation of its network.'

It is therefore the case that any development site having an adverse impact on the SRN, which may lead to or increase mainline queuing, or lengthen the period for which mainline queuing occurs, would be considered to have a severe impact. In such a circumstance, mitigation will be sought. Highways England would expect this mitigation to be identified and agreed at the Local Plan stage, to support any development allocations identified. This should take the form of a policy provision with appropriate signposting to an Infrastructure Development Plan (IDP), with supporting transport evidence and strategy.

Sustainability Appraisal Objectives and Alternatives

The Sustainability Appraisal is currently at Stage B, which comprises developing and refining options and assessing effects prior to the preparation of the Sustainability Appraisal Report.

There is currently no preferred approach to how Settlement Boundaries are to be established within the Plan, or what methodology should be employed to calculate the Local Plan housing target. As the specific location and associated quantum of development has not yet been determined, the transport impact upon the safe and efficient operation of the SRN is currently unknown.

To aid the Council's preparation of the Sustainability Appraisal Report, the NPPF provides guidance on the early stages of plan making. For example, paragraph 72 which considers the identification of large sites for new housing development. In the criteria for identifying suitable large sites it notes "consider the opportunities presented by existing or planned investment in infrastructure". Also, paragraph 102 sets out the transport issues that should be considered at the earliest stages of plan-making and development proposals.

It is therefore suggested that during the process of identifying potential sites for development, particularly major allocations, an assessment of the infrastructure required to accommodate the transport impact of development is undertaken. This assessment will help identify locations where there could be deliverability challenges in realising the necessary infrastructure required to support development, which should inform the site selection process.

Objectives, Issues & Options Questions

Objectives question: Do you agree that these are the right Objectives for the Local Plan?

Highways England is broadly supportive of the proposed nine Objectives, with specific reference to Objective 5 which seeks to ensure that 'new development is supported by essential infrastructure in a timely manner'. It is important that infrastructure necessary to support planned growth is identified within the Plan, together with clarity on the mechanisms for securing necessary funding and delivery, to ensure it is delivered in step with the growth it is required to support.

Question 1a. Should we aim to require that all new development is 'zero' carbon by as soon as possible (e.g. by 2025) or give slightly more time (e.g. by 2030) for developers to adapt their design approaches, materials and suppliers?

No comment.

Question 1b. Should we allocate sites for specific renewable energy development or identify broad areas which we consider suitable?

No comment.

Question 1c. Do you have any comments on these policy approaches? (Issue 1 – Carbon Neutrality)

No comment.

Question 2a. Do you agree with the tiers that identifies Taunton followed by 6 tiers covering the other settlements? If not, what changes would you make and why?

Highways England needs to understand the transport impacts of the proposed Local Plan growth. As the specific quantum of development at each settlement tier has not yet been established, the impact of growth in these locations is not yet known. The transport impact of development allocated at each settlement will need to be tested through the development of a robust transport evidence base, which will enable us to provide specific comments relating to the suitability or constraints of each settlement.

Highways England supports development in sustainable locations which has access to the services and amenities it requires without reliance on the private car. Developments that are able to reduce the use of the SRN for non-strategic trips will also be supported.

Question 2b. Do you think Watchet and Williton should be seen as associated settlements for the purposes of the Local Plan due to their close proximity and in complementing the services of each other (and therefore be in a higher tier than Bishops Lydeard and Wiveliscombe)?

No comments in addition to our response to Question 2a above.

Question 2c. Do you think we should carry on with the way housing is currently distributed across our area or should we be doing something different, such as one of the three options suggested above?

Highways England's requirement is that when the local planning authority identifies specific sites for potential allocations, the transport impacts of these sites will be assessed. As the specific location of the sites is not known at this time it is not possible to offer specific comments, however, when considering potential sites to take forward, we would urge consideration of:

- The location of the potential sites with respect to the SRN and the likelihood that traffic would need to travel across a junction or on the SRN to access services and facilities;
- The ability to provide mitigation to ensure that there are no severe impacts on the SRN.

As previously stated, Highways England supports development in sustainable locations which has access to the services and amenities it requires without reliance on the private car. Developments that are able to reduce the use of the SRN for non-strategic trips will also be supported.

Question 2d. Do you have any comments on these policy approaches (Issue 2 – Sustainable Locations)?

Highways England welcomes the proposed inclusion of additional policy approach 2b/1 which requires development to demonstrate how they will reduce the need to travel through their location, design and infrastructure. Development should be supported by a robust Travel Planning strategy which is appropriately monitored and managed to ensure that sustainable travel options are both realistic and fully implemented.

Question 3a. Should our housing requirement figure match the Government's minimum figure of 702 dwellings per year or should we have a higher figure?

We have no specific comments on whether the Council should seek a higher housing requirement figure than the minimum set by Government. The quantum of housing proposed and the infrastructure necessary to support it will need to be deliverable within the Plan Period. The Plan should therefore include realistic housing trajectories which are linked within the Plan's policies to an Infrastructure Delivery Plan.

Question 3b. How should we proactively plan for Gypsy, Traveller and Travelling Showpeople pitches?

No comment.

Question 3c. Should we require all new housing developments to make sure that a percentage of the new homes are designed to be accessible, adaptable and wheelchair accessible?

No comment.

Question 3d. Should we allocate sites and/or make sure a percentage of housing developments are for self-built plots for people wanting to build their own homes? Should we allow self-built plots on Rural Exception sites providing they are affordable?

No comment.

Question 3e. Do you have any comments on these policy approaches (Issue 3 – New and affordable homes)?

No comment.

Question 4a. Should we ensure the growth of our local economy through an increase in the proportion of higher value jobs (with limited increase of jobs overall) or through a significant increase in jobs?

No comment.

Question 4b. Should we keep all of our existing employment sites and allocations in employment use or should we allow the loss of some to other uses? How should we decide which ones to lose?

Whilst Highways England has no suggestions on specific locations for employment growth, it is vital that development should be targeted at sustainable sites to reduce any imbalance between population and jobs and avoid additional trips on the SRN as a result of out-commuting. Similarly, the impact of any proposed reduction in employment allocations will need to be carefully considered in respect of shifting commuting patterns and the potential effects on the surrounding road network including the SRN.

In terms of location, employment development often contributes significantly to peak hour traffic, and hence there can be challenges to accommodating high levels of trip demand, which may only exist for limited periods of the day, on the SRN. The attraction to business of locating in highly accessible locations is recognised, and we are aware that many businesses would like to be located close to the SRN. Indeed, for some businesses, close proximity to the SRN is essential. Thus, the location of employment sites is as important to Highways England as the location of housing sites.

Question 4c. Do you have any comments on these policy approaches (Issue 4 - A prosperous economy)?

No comment.

Question 5a. On what infrastructure should we prioritise developer contributions? Should we require: (i) More affordable housing but lower design and infrastructure requirements; or (ii) Less affordable housing but higher design and infrastructure requirements?

Regardless of the proposed development mix, the transport impact of planned growth needs to be assessed through the development of a robust transport evidence base to identify whether these trips could be safely accommodated by the existing infrastructure. If such assessment indicates that the development could not be safely accommodated, suitable phasing and appropriate mitigation measures would need to be identified and delivered in step with the development.

Infrastructure identified as necessary to support development should be set out within an Infrastructure Delivery Plan which is clearly signposted within relevant Plan policies. The Plan should also set out the mechanisms to ensure the funding necessary to delivery required infrastructure will be secured.

Question 5b. Do you have any comments on these policy approaches (Issue 5 – Infrastructure)?

Highways England welcomes the proposed inclusion of additional policy approach 5b/1 which seeks to set out the approach to infrastructure provision via S106 or CIL. In respect of the delivery of necessary infrastructure, it would be useful to include points of clarity on developer contributions/mechanisms for securing highways infrastructure funding in a single overarching Infrastructure Policy rather than individual Plan objective or site policies.

Question 6a. How can we encourage people not to use their car when travelling into towns for shopping and work? How can we provide more opportunities for using public transport in rural areas?

The Local Plan Spatial Strategy should ensure that development is targeted at sustainable sites in order to avoid unnecessary vehicular trips as a result of out-commuting and travelling to retail and leisure facilities. Robust Travel Planning measures should be implemented across new growth sites to ensure development contributes towards accessible and viable sustainable travel options which offer realistic alternatives to the private car.

Question 6b. Do you have any comments on these policy approaches (Issue 6 – Connecting people)?

Highways England welcomes the proposed inclusion of additional policy approach 6b/1 which seeks to provide Policy Guidance on sustainable transport measures including Travel Plans and Transport

Assessment. We consider it would be useful to include such Policy guidance in an overarching Infrastructure Policy rather than individual Plan objective or site policies.

Question 7a. Are there any specific measures that you would like to see new development delivery to improve biodiversity locally?

No comment.

Question 7b. Do you have any comments on these policy approaches (Issue 7 – The natural and historic environment)?

No comment.

Question 8a. Should we keep or remove settlement boundaries? Or should we have settlement boundaries in areas where there is higher pressure from development i.e. closer to Taunton, Wellington and Wiveliscombe but remove them in more remote areas to provide more options for development?

Highways England's expectation is that when the local planning authority identifies specific sites for potential allocations, the transport impacts of these sites will be assessed. As the specific location of the sites is not known at this time it is not possible to offer specific comments, however, when considering potential sites to take forward, we would urge consideration of:

- The location of the potential sites with respect to the SRN and the likelihood that traffic would need to travel across a junction or on the SRN to access services and facilities;
- The ability to provide mitigation to ensure that there are no severe impacts on the SRN.

Development at existing settlements may benefit from existing transport network as well as provide the opportunity to create new communities with access to education, retail and employment opportunities. In transport terms there may be opportunities to integrate the extension into the existing transport networks, and opportunities to create new networks to support the urban extensions and benefit existing urban areas.

Careful consideration should be given to the necessary transport infrastructure that would be required to support a new settlement, regardless of scale. Site locations that can be made sustainable in terms of transport movements, and hence avoid adverse impact on the SRN, are likely to be less challenging.

When considering the location and associated supporting infrastructure of new settlements, the SRN should not be considered as an alternative to providing improvements to the existing local road network. The infrastructure improvements to support a new settlement should include the planning of adequate highway infrastructure capacity to provide for local movements, thereby maximising the ability of the SRN to serve strategic movements to and from the Plan area and more widely. Excessive use of the SRN for local movements impacts on the performance of the SRN and hence its ability to support economic growth in the Plan area and more widely.

Question 8b. Do you have any comments on these policy approaches (Issue 8 – Thriving coastal and rural communities)?

No comment.

Question 9a. Do you have any comments on these policy approaches (Issue 9 – Wellbeing of our residents)?

No comment.

Question 10a. How do you think we could introduce more housing into Taunton Town centre?

No comment.

Question 10b. Do you have any comments on these policy approaches (Issue 10 – Policies for our places: Taunton)?

No comment.

Question 11a. Do you have any comments on these policy approaches (Issue 11 - (Policies for our places: Wellington)?

No comment.

Question 12a. Do you have any comments on these policy approaches (Issue 12 - Policies for our places: The Coastal Strip)?

No comment.

Conclusion

We have set out above our high-level comments in respect of the Somerset West and Taunton Local Plan Review Issues and Options Consultation. Highways England's primary interest is ensuring that the traffic demand arising from Local Plan growth will not result in severe safety impacts on the SRN.

Development should be promoted at locations that are, or can be made, sustainable allowing and encouraging the uptake of sustainable transport modes. Furthermore, when considering the location and associated supporting infrastructure for new housing and employment areas, we note that the SRN should not be considered as an alternative to providing improvements to the existing local road network to accommodate additional traffic. The planning of adequate local highway infrastructure to provide for local movements should be an integral part of the transport strategy, thereby maximising the ability of the SRN to serve strategic movements to and from settlements in the Plan area for residential based, freight journeys and business travel. Excessive use of the SRN for local movements impacts on the performance of the SRN and hence its ability to support wider ambitions for economic growth in the Plan area and beyond. Thus, it is our expectation that the local planning and highway authority will look to strengthen and improve sustainable travel networks and local highway connections to facilitate proposed growth before testing potential mitigation options comprising significant upgrades to the SRN.

In order to be able to assess the impact of the proposed Plan growth on the SRN, Highways England will need to understand the location, scope and scale of growth together with the likely phasing that will be adopted. Depending on the location of the proposed settlements, the growth could result in additional trips using the SRN. The cumulative impact of the Local Plan development proposals should therefore be assessed through the development of robust transport evidence base to identify whether these trips could be safely accommodated by the existing SRN infrastructure. If such

assessment indicates that the planned growth cannot be safely accommodated, suitable phasing and appropriate mitigation measures on the SRN would need to be identified and discussed with Highways England, and signposted within the relevant Plan policies and supporting Infrastructure Delivery Plan (IDP) to ensure the Plan is compliant with NPPF and able to be considered sound.

We would be happy to work with the Council to ensure the timely development of a robust transport evidence base required to support the new Local Plan. We would therefore welcome early engagement to identify the scope of the transport evidence required to ensure the impact of the Somerset West and Taunton Local Plan on the strategic road network is fully understood.

We trust that our response will be helpful and assist you with your Local Plan review. If you require further clarification on any issues, please do not hesitate to contact me.

Yours sincerely,



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